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12  
13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 Yigremew Temesgen,

16 Plaintiffs,

17 v.

18 United States Citizenship and Immigration  
19 Services; Merrick Garland, in his Official  
20 Capacity Attorney General; United States  
21 Department of State; Anthony Blinken, in  
22 his Official Capacity, Secretary of State;  
23 U.S. Consulate in Ethiopia; Chief,  
Immigrant Visa Section, in Ethiopia; John  
Doe, Consular Officer, Ethiopia,

24 Defendants.

Case No. 2:23-cv-02119-CDS-DJA

25 **Stipulation and Order to Extend Federal  
Defendants' Deadline to Answer or  
otherwise Respond to Plaintiff's Complaint  
for Writ of Mandamus and Complaint  
Under Administrative Procedure Act (ECF  
No. 1)**

(First Request)

26 Plaintiff, Yigremew Temesgen, through counsel and the United States of America,  
27 on behalf of Federal Defendants, through counsel, hereby agree and stipulate to extend the  
28 deadline to answer or otherwise respond to Plaintiff's Complaint for Writ of Mandamus  
and Complaint Under Administrative Procedure Act by 30 days, until **May 1, 2024**. The  
29 parties enter into this stipulate based on the following:

30 1. Plaintiff filed the Complaint on December 26, 2023 (ECF No. 1).

1       2. Plaintiff served the United States with a copy of the Summons and  
2 Complaint on January 31, 2024.

3       3. The current deadline for Federal Defendants to answer or otherwise respond  
4 is April 1, 2024.

5       4. Since the filing and service of the Complaint, the parties have engaged in  
6 actions that may resolve the issues in this case without the Court's intervention. Those  
7 actions include the agency's issuance of a Notice of Intent to Revoke ("NOIR") on  
8 February 5, 2024, and Plaintiff responding to the NOIR. The agency has reviewed  
9 Plaintiff's response and plans on making a decision on the NOIR.

10       5. The requested 30-day extension will allow the parties additional time to  
11 allow the agency and Plaintiff to work towards a possible resolution on the administrative  
12 side.

13       6. Should the parties be able to resolve the matter without further litigation, a  
14 dismissal will follow. Should the parties be unable to resolve the matter without Court  
15 interventions, Federal Defendants will move forward with responding to the Complaint on  
16 or before May 1, 2024. Accordingly, the parties believe good cause exists for the extension  
17 sought due to the interests of judicial economy and the parties' resources.

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1 Therefore, Federal Defendants request that the Court extend the deadline for them  
2 to answer or otherwise respond to **May 1, 2024**.

3 Respectfully submitted this 29th day of March 2024.

4 IMMIGRATION LEGAL  
CONSULTING, LLC

5  
6 /s/ Shaina Plaksin  
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8 *Attorney for Plaintiff*

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United States Attorney

/s/ Skyler H. Pearson  
SKYLER H. PEARSON  
Assistant United States Attorney  
*Attorneys for the United States*

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11 IT IS SO ORDERED  
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13 UNITED STATES MAGISTRATE JUDGE  
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DATED: 4/2/2024